

## **REMARKS/ARGUMENTS**

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the following remarks.

### **I. STATUS OF THE CLAIMS AND FORMAL MATTERS**

Claims 1-32 are pending. Claims 1-21 and 23-32 are independent.

### **II. SUPPORT FOR REMARKS IN SPECIFICATION**

Support for the remarks is provided throughout the Specification as originally filed and specifically at paragraph [0172] of Applicants' corresponding published application. By way of example and not limitation:

[0172] In this programme preparation and distribution system 100, a database is constructed in which the archive system 40 manages metadata in a concentrated fashion along with the essence such as video and audio data. By the distributed programme editing system 10, **the metadata inputted at the planning processing PP1 and at the casting processing PP2 is registered in the database managed in a concentrated fashion by an archival manager 40A of the archive system 40, at the same time as a tag specifying the registered metadata is issued.** This tag is co-packed with the video and audio information obtained on acquisition by the acquisition system 60. In the production system 20, the timing to flow the staff roll is specified during the off-line processing PR4 in the production system 20. In accordance with the specified timing, **the metadata is taken out from the database pointed by the tag co-packed with the video information or the audio information** to generate the corresponding character automatically to effect complete editing processing.

### III. RESPONSE TO REJECTIONS UNDER 35 U.S.C. §103(a)

Claims 1-32 were rejected under 35 U.S.C. §103(a) over U.S. Patent No.

6,311,194 to Sheth, et al. (hereinafter, merely "Sheth") in view of U.S. Patent No. 6,199,081 to Meyerzon, et al. (hereinafter, merely "Meyerzon").

Claim 1 recites, *inter alia*:

...wherein the archiving means issues and archives a **tag pointing the archiving means that archives the metadata that explains the essence...** . (Emphasis added)

As understood by Applicants, Meyerzon relates to methods and systems for retrieving data from network sites and processing that data according to its content.

Applicants submit that neither Sheth nor Meyerzon, taken alone or in combination, that would disclose or render predictable the above-identified features of claim 1. Specifically, neither of the references used as a basis for rejection discloses or renders predictable "the archiving means issues and archives a **tag pointing the archiving means that archives the metadata that explains the essence,**" as recited in claim 1.

Specifically, the Office Action (page 3) concedes that Sheth fails to mention a tag that points the archiving means that archives the metadata that explains the essence, but asserts that Meyerzon discloses automatic tagging of documents, and refers to Meyerzon, col.1, lines 35-45, which are reproduced as follow:

A HTML document contains text and tags. HTML documents may also contain metadata and metatags. Metadata is data about data and metatags define the meta-data. **Examples of metatags that identify meta-data are "author," "language," and "character set."** HTML documents may also include tags that contain

embedded "links" or "hyperlinks" that reference other data or documents located on the same or another Web server computer. The HTML documents and the document referenced in the hyperlinks may include text, graphics, audio, or video in various formats.

Thus, Meyerzon describes that "metadata is data about data and metatags define the meta-data," and **examples of metatags that identify meta-data are "author," "language," and "character set."** Thus the disclosure fails to teach or render predictable "the archiving means issues and archives a **tag pointing the archiving means that archives the metadata that explains the essence,**" as recited in claim 1.

Furthermore, this deficiency of Meyerzon is not cured by the supplemental teaching of Sheth.

Therefore, Applicants submit that independent claim 1 is patentable and respectfully request reconsideration and withdrawal of the rejection.

For reasons similar to, or somewhat similar to, those described above with regard to independent claim 1, independent claims 2-21 and 23-32 are also patentable, and Applicants thus respectfully request reconsideration of the rejections thereto.

#### **IV. DEPENDENT CLAIMS**

The other claims in this application are each dependent from one of the independent claims discussed above and are therefore believed patentable for at least the same reasons. Applicants thereby respectfully request reconsideration and withdrawal of rejections thereto. Because each dependent claim is also deemed to define an additional aspect of the

invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

### **CONCLUSION**

Because Applicants maintain that all claims are allowable for at least the reasons presented hereinabove, in the interests of brevity, this response does not comment on each and every comment made by the Examiner in the Office Action. This should not be taken as acquiescence of the substance of those comments, and Applicants reserve the right to address such comments.

In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited reference, or references, it is respectfully requested that the Examiner specifically indicate those portions of the reference, or references, providing the basis for a contrary view.


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In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,

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